Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of	)	
	)	
Location Based Routing for Wireless 911 Calls	)	PS Docket No. 18-64
	)	

June 21, 2018

REPLY COMMENTS OF CAL OES 911 BRANCH

The California Governor's Office of Emergency Services (Cal OES) applauds the FCC to request comments to Location Based Routing for Wireless 911 Calls, PS Docket No. 18-64 and hereby submits the following reply comments.

As technology with devices and advanced networks enable better location, any and all valid locations should be used for routing 911 calls, as long as the 9-1-1 caller is not delayed before the call is initiated. The J-STD-036 is obsolete based upon the new devices and advanced networks and should be updated to promote the best location for initial call routing.

Below are the key items California looks forward to working on with industry and the FCC to update the J-STD-036 for location information:

1. Cell phone OEM manufacturers should modify the firmware within the phone itself to allow the cell phone the ability to select from the best location automatically. This will enhance security and provide a location using the same security that is used in the FCC J-STD-036 Standard.
2. At the time of the 911 call, if the Standard FCC J-STD-036 XY location is not available the phone should use the Hybrid (DBH) location similar to the Apple AML for iPhones or Google ELS for Android devices. Finally, the third tier should allow the phone to

search the applications running in the background (i.e. Google Maps, Waze and others) to provide the last known XY location as supplemental location data.

3. Geospatial Routing with shape files is a key component of Next Gen 9-1-1 and depends upon all originating service providers to deliver accurate location with the 9-1-1 call. If an accurate location was delivered to the Next Gen 9-1-1 system, the call could be routed to the correct PSAP based on the location of the device rather than the location of the cellular tower.
4. Cal OES does not see the value in restricting the type of service provider that has authority to provide accurate location data.

The CA 911 Branch actively pursues initiating the most advanced technologies statewide to accommodate our 440 PSAPs and over 28 million calls annually. The improvement location accuracy for delivering wireless calls is paramount as we transition to Next Gen 9-1-1.

Respectfully submitted,
Cal OES 9-1-1 Emergency Communications Branch

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